

1 Laura A. Stoll (SBN: 255023)
LStoll@goodwinlaw.com
2 GOODWIN PROCTER LLP
601 South Figueroa Street, 41st Floor
3 Los Angeles, CA 90017
Tel.: (213) 426-2500
4 Fax: (213) 623-1673

5 *Attorneys for Defendants*
Nationstar Mortgage, LLC and Mr. Cooper
6 *Group, Inc.*

7 *Additional counsel listed below*

8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10 FRESNO DIVISION
11

12 ADRIAN SCOTT RANGLES, individually
13 and on behalf of all others similarly situated,

14 Plaintiff,

15 v.

16 NATIONSTAR MORTGAGE, LLC, a
Delaware Limited Liability Company d/b/a Mr.
17 Cooper, and MR. COOPER GROUP, INC., a
Delaware Corporation,

18 Defendants.
19

Case No. 1:24-CV-00177-KES-SKO

**STIPULATION FOR EXTENSION OF
TIME AND ORDER**

(Doc. 14)

Pursuant to Civil Local Rule 144(a), Plaintiff Adrian Scott Randles (“Plaintiff”) and Defendants Nationstar Mortgage, LLC and Mr. Cooper Group, Inc. (“Defendants”) (together, the “Parties”), by and through their respective attorneys, stipulate as follows:

WHEREAS, Plaintiff filed his Complaint on February 7, 2024 (*see* Dkt. No. 1);

WHEREAS, Defendants waived service on February 7, 2024 (*see* Dkt. Nos. 5-6);

WHEREAS, the current deadline for Defendants’ response to the Complaint is April 8, 2024;

WHEREAS, the Initial Scheduling Conference is scheduled for May 7, 2024;

WHEREAS, Plaintiff filed a Motion for Class Certification (“Class Cert. Motion”) on February 28, 2024;

WHEREAS, Plaintiff served the Class Cert. Motion by mail on February 29, 2024;

WHEREAS, Defendants do not have a record of having received service of the Class Cert. Motion;

WHEREAS, a hearing on the Class Cert. Motion is noticed for May 1, 2024;

WHEREAS, Defendants intend to file a Motion to Transfer Venue to the Northern District of Texas, and the parties agree that, for efficiency of the Court and the Parties’ time and resources, the Motion to Transfer should be heard prior to the Class Cert. Motion and prior to Defendants responding to the Complaint;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT, subject to the Court’s approval:

1. The parties agree that Defendants’ anticipated Motion to Transfer Venue should be heard by the Court prior to the Class Cert. Motion and Defendants’ response to the Complaint;
2. The deadline for Defendants to respond to the Class Cert. Motion is hereby extended to April 17, 2024; and
3. The deadline for Defendants to respond to the Complaint is hereby extended to May 8, 2024.

This is the Parties' first request for an extension of Defendants' time to respond to the Complaint and the Parties' first request for an extension of Defendants' time to respond to the Class Cert. Motion.

IT IS SO STIPULATED.

Dated: March 12, 2024

Respectfully submitted,

By: /s/ Patrick H. Peluso (as authorized on 3/12/2024)

PATRICK H. PELUSO (*admitted pro hac vice*)
WOODROW & PELUSO, LLC
3900 East Mexico Avenue, Suite 300
Denver, CO 80210
ppeluso@woodrowpeluso.com
Telephone: (720) 213-0676

Attorneys for Plaintiff

Dated: March 12, 2024

Respectfully submitted,

By: /s/ Laura A. Stoll

LAURA A. STOLL (SBN: 255023)
lstoll@goodwinlaw.com
GOODWIN PROCTER LLP
601 S. Figueroa Street, Suite 4100
Los Angeles, CA 90017
Tel: +1 213 426 2625
Fax: +1 213 289 7725

*Counsel for Defendants Mr. Cooper Group, Inc. and
Nationstar Mortgage d/b/a Mr. Cooper*

ORDER

Based on the foregoing stipulation of the parties (Doc. 14), and for good cause shown, it is hereby ORDERED that the deadline for Defendants to respond to the Class Certification Motion is hereby extended to April 17, 2024, and the deadline for Defendants to respond to the Complaint is hereby extended to May 8, 2024.

1 Because the parties have stipulated to have Defendants' Motion to Transfer (Doc. 15)
2 decided by a District Judge before the pending Motion for Class Certification (Doc. 9), the Court
3 ORDERS that, in the interest of litigation economy and judicial efficiency, Plaintiff's pending
4 Motion for Class Certification (Doc. 9) is HELD IN ABEYANCE until Defendant's Motion to
5 Transfer (Doc. 15) is resolved.

6 The hearing on the Motion for Class Certification, currently set for May 1, 2024, is hereby
7 VACATED, and a hearing will be re-set, if appropriate, after resolution of the Motion to Transfer.
8 If the Court denies the Motion to Transfer, Plaintiffs shall file a notice to re-set the hearing on the
9 Motion for Class Certification within seven (7) days of issuance of the denial order.

10
11
12 IT IS SO ORDERED.

13 Dated: **March 14, 2024**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I certify under the penalty of perjury that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 14, 2024.

/s/ Laura A. Stoll

Laura A. Stoll